

On behalf of the National Volunteer Fire Council (NVFC), I would like to express our support for the creation of a nationwide wireless broadband network for public safety using 10 MHz of spectrum in the 700 MHz band currently scheduled for public auction in combination with 12 MHz in the 700 MHz band previously allocated for public safety. This proposal will help public safety in many ways; however, I will focus my comments on how its implementation would benefit volunteer public safety organizations in particular.

There are several factors that will be key to the success of this proposal. First and foremost, public safety has to be in charge of the broadband network. Furthermore, as a condition for receiving the license for the spectrum designated to be auctioned, the auction winner should be required to enter into an agreement with a group of public safety organizations, including the NVFC, establishing that public safety has control over how the network is built.

It is also important that the broadband network reach all areas of the country, including the rural and underserved portions that tend to rely more heavily on volunteer emergency services.

Communications operability and interoperability are both significant challenges for the volunteer fire and emergency services. There are approximately 24,000 volunteer departments in the United States relying on patchwork communications systems utilizing a multitude of frequencies. Achieving interoperability at the state or regional level would require a significant infusion of resources. Due to a lack of funding, however, many departments struggle with basic equipment and apparatus upkeep. For some departments, purchasing expensive communications equipment in order to improve operability or to become interoperable simply isn't an option.

By subscribing to the broadband network, public safety agencies would potentially be able to communicate with agencies on different MHz bands using different equipment. This would give volunteer public safety agencies the ability to upgrade communications systems for operability purposes while maintaining interoperable communications with other agencies that subscribe to the network. Agencies that choose not to upgrade communications equipment could still improve their ability to communicate with other agencies through the broadband network.

We appreciate having an opportunity to provide commentary on this proposal. If you have any questions, please feel free to contact me or Dave Finger, NVFC Director of Government Relations, at (202) 887-5700, ext. 12.

Sincerely

Philip C. Stittleburg
Chairman